

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC. SECURITIES LITIGATION	CASE NO. 4:19-CV-00957 (CONSOLIDATED)  JUDGE GEORGE C. HANKS, JR.  THIS DOCUMENT RELATES TO:  CASE NO. 4:22-CV-01189 CASE NO. 4:22-CV-02590
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**THE DIRECT ACTION PLAINTIFFS' UNOPPOSED MOTION TO SEAL**

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The Alyeska Plaintiffs and the Orbis Plaintiffs<sup>1</sup> (collectively, the “Direct Action Plaintiffs”) respectfully request leave to file under seal unredacted copies of (1) the Direct Action Plaintiffs’ Opposition to Defendants’ Motion for Summary Judgment on Opt-Out Plaintiffs’ Claims (Dkt. 578), (2) the Rolnick Declaration<sup>2</sup> submitted therewith, together with the exhibits thereto (Dkt. 575), (3) the Declaration of Randy Mitchell submitted therewith, together with the exhibits thereto (Dkt. 577), (4) the Declaration of Adam R. Karr submitted therewith, together with the exhibits thereto (Dkt. 576), and (5) the Direct

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<sup>1</sup> The “Alyeska Plaintiffs” are: Alyeska Master Fund, L.P., Alyeska Master Fund 2, L.P., and Alyeska Master Fund 3, L.P. The “Orbis Plaintiffs” are: Orbis Global Equity LE Fund (Australia Registered), Orbis Global Equity Fund (Australia Registered), Orbis Global Balanced Fund (Australia Registered), Orbis SICAV, Orbis Institutional Global Equity L.P., Orbis Global Equity Fund Limited, Orbis Institutional Funds Limited, Allan Gray Australia Balanced Fund, Orbis OEIC, and Orbis Institutional U.S. Equity L.P.

<sup>2</sup> The “Rolnick Declaration” is the Declaration of Lawrence M. Rolnick in Opposition to Defendants’ Motion for Summary Judgment on Opt-Out Plaintiffs’ Claims.

Action Plaintiffs’ Joinder in Class Plaintiffs’ Opposition to Alta Mesa Resources, Inc., Chappelle, Ellis, and Smith’s Motion for Summary Judgment and Incorporated Memorandum of Law on Plaintiffs’ Section 10(b) and 20(a) Claims (Dkt. 583) (collectively, the “Opposition Materials”). No party objects to the relief sought in this motion.

As grounds for this motion, the Direct Action Plaintiffs state as follows:

1. On August 17, 2021, the Court entered the Stipulation and Protective Order (“PO”) (Dkt. 190), which governs the handling of confidential information exchanged in discovery in this matter.

2. According to Paragraph 24 of the PO, “[i]f any party submits Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material to the Court, the submission must be filed only under seal on CM/ECF if filed electronically[.]” PO at ¶ 24 (emphasis added).

3. The Opposition Materials contain, describe and refer to non-public documents and information that have been designated by the parties and nonparties as Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material, pursuant to the PO.

4. On January 18, 2024, prior to the filing of the Opposition Materials, Direct Action Plaintiffs asked counsel for all Defendants and the Class Plaintiffs by e-mail if they opposed the filing of the Opposition Materials under seal, and no counsel opposed or objected to the filing.

5. Today, pursuant to the PO, the Direct Action Plaintiffs filed the Opposition Materials under seal. The Direct Action Plaintiffs will file a public, redacted version of the Opposition Materials within five (5) business days.

6. The Direct Action Plaintiffs are bound by the provisions of the PO, and therefore must, and now do, seek leave to file the Opposition Materials under seal.

THEREFORE, the Direct Action Plaintiffs request that the Court grant their request for leave to file under seal unredacted copies of the Opposition Materials.

Dated: January 19, 2024

Respectfully submitted,

By: /s/ Lawrence M. Rolnick

Lawrence M. Rolnick

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**CERTIFICATE OF SERVICE**

I certify that this motion has been served on counsel of record via the Court's ECF system on January 19, 2024.

/s/ Lawrence M. Rolnick

Lawrence M. Rolnick

**CERTIFICATE OF CONFERENCE**

I certify that on January 18, 2024, counsel for Direct Action Plaintiffs conferred with counsel for all Defendants and the Class Plaintiffs regarding the substance of this Motion. No parties opposed.

/s/ Lawrence M. Rolnick

Lawrence M. Rolnick